## James Bonini

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

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| AL BEAMER, et al.,   | ) | Civil Action No.: C-1-02-013 |
|----------------------|---|------------------------------|
| Plaintiffs,          | ) | Judge Spiegel                |
|                      | ) |                              |
| <b>v.</b>            | ) |                              |
|                      | ) |                              |
| NETCO, INC., et al., | ) | DEFENDANTS' MOTION FOR       |
|                      | ) | ADMISSION PRO HAC VICE       |
| Defendants.          | Ś | OF WILLIAM M. LAWSON AND     |
|                      | ) | WILLIAM B. JONES             |

Comes now Jacqueline Schuster Hobbs, an attorney admitted to practice before the Courts of Ohio and this Court, and local counsel for Defendants, and hereby moves this Court for an order admitting William M. Lawson and William B. Jones to appear pro hac vice in the above-referenced matter. In support of this motion, movant states as follows:

- 1. William M. Lawson currently resides at 1659 Dearborn Dr., St. Louis, MO 63122. His telephone number at that residence is 314-966-5114.
- 2. William B. Jones currently resides at 914 Wood Avenue, St. Louis, MO 63122. His telephone number at that residence is (314) 966-8555.
- 3. The business address for each attorney is 2730 North Ballas Road, Suite 200, St. Louis, Missouri 63131-3039. The telephone number is (314) 567-7350, and the facsimile number is (314) 567-5968. Mr. Lawson's direct dial phone number is (314) 802-1864, and his email address is lawson@mcmahonberger.com. Mr. Jones' direct dial phone number is (314) 802-1854, and his e-mail address is jones@mcmahonberger.com.
- 4. Mr. Lawson's Missouri Bar registration number is 40477 and Mr. Jones' Missouri Bar registration number is 48220.

- 5. Mr. Lawson is a member in good standing of the bars of the following courts: Missouri Supreme Court, Illinois Supreme Court, and the United States District Court for the Eastern District of Missouri. Attached hereto is a copy of an Affidavit swearing to Mr. Lawson's good standing in all of the above-referenced courts.
- 6. Mr. Jones is a member in good standing of the bars of the following courts: Missouri Supreme Court, United States District Court for the Eastern District of Missouri, and the United States District Court for the District of Arizona. Attached hereto is a copy of an Affidavit swearing to Mr. Jones' good standing in all of the above-referenced courts.
  - 7. Plaintiffs' counsel has been contacted and has consented to this Motion.
- 8. Mr. Lawson and Mr. Jones agree to review and abide by all of the Local Civil Rules of the Southern District of Ohio.
- 9. The inclusion of Mr. Lawson and Mr. Jones in the defense of defendants is essential to defendants' full representation and will facilitate the handling and trial of this matter.

Respectfully submitted,

Donald J. Mooney, Jr. (0014202)

Jacqueline Schuster Hobbs (0068236)

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Attorneys for Defendants

## **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing was filed manually with the Court and a copy thereof served upon Richard C. Haber, Esq., and Vince P. Antaki, Esq., REMINGER & REMINGER, Attorneys for Plaintiffs, 1400 Midland Building, 101 Prospect Avenue West, Cleveland, Ohio 44115-1093, by regular U.S. Mail, postage this 16th day of March, 2004.

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